

BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

EX PARTE OR LATE FILED

February 11, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
FEB 11 2000
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ORIGINAL

Re: Written Ex Parte in CC Docket No. 98-121
and CC Docket No. 99-295

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Claudia Fox, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division, with copies of that ex parte going also to William Agee and Jake Jennings. That ex parte consists of a copy of an Exception that KPMG filed with the Georgia Public Service Commission on February 8, 2000, in connection with KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS. Included with the Exception is BellSouth's response to it. Also included in the ex parte is a copy of BellSouth's Supplement to the Proposed Supplemental Test Plan Version 1.0, filed with the Georgia Commission on February 7, 2000.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the record in each of those proceedings.

Sincerely,

Kathleen B. Levitz
Kathleen B. Levitz

Attachment

cc: Claudia Fox (w/o attachment)
William Agee (w/o attachment)
Jake Jennings (w/o attachment)

074

BELLSOUTH

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Kathleen B. Levitz
Vice President-Federal Regulatory

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February 11, 2000

WRITTEN EX PARTE

Ms. Claudia Fox
Policy and Program Planning Division
Common Carrier Bureau
Room 5-C235
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

Re: CC Docket No. 98-121 and CC Docket No. 99-295

Dear Ms Fox:

Attached is a copy of KPMG Exception 9 arising during KPMG's execution of the Georgia Third-Party Testing Plan for BellSouth's Operation Support Systems, or OSS and BellSouth's response to the exception. Both were filed with the Georgia Public Service Commission on February 8, 2000. Also enclosed is a copy of BellSouth's supplement to the Proposed Supplemental Test Plan Version 1.0 filed with the Georgia Commission on February 7, 2000. I am sending these filings to you in response to the request that BellSouth share with you documentation related to the third party-testing program currently underway in Georgia. If you have any questions after reviewing the documents, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, for each of the dockets identified above, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in those dockets.

Sincerely,



Kathleen B. Levitz
Attachment

cc: William Agee
Jake Jennings

Fred McCallum Jr.
General Counsel - Georgia

BellSouth Telecommunications, Inc.
Legal Department
Suite 376
125 Perimeter Center West
Atlanta, Georgia 30346
Telephone: 770-391-2416
Facsimile: 770-391-2812

February 7, 2000

DELIVERED BY HAND

RECEIVED

FEB 07 2000

EXECUTIVE SECRETARY
G.P.S.C.

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W., Room 520
Atlanta, Georgia 30334

Re: Investigation into Development of Electronic Interfaces for
BellSouth's Operational Support Systems; Docket No. 8354-U

Dear Ms. O'Leary:

Enclosed for filing are an original and twenty-eight copies, as well as an electronic copy, of BellSouth Telecommunications, Inc.'s supplement to the Proposed Supplemental Test Plan, Version 1.0, in the above-referenced matter. I would appreciate your filing same and returning three copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Attached are two spreadsheets (Exhibits 1 and 2) that are referenced in Appendix B, Subsection B to the Supplemental Test Plan that was filed on January 24, 2000. The first spreadsheet shows the Top 50 resold services. Approximately 33 of these are electronically orderable. These are categorized on the top of the list. The electronically orderable services are broken down into two categories, Foundation Services and Features. These Foundation Services are the core services that are used in the first instance by a reseller to provide service to an end user, such as a business line, a residence line, a PBX trunk, and a Synchronet line. The Features, such as Custom Calling and Touchstar, are added on to a customer's Foundation Service. Also included in these spreadsheets are the in-service numbers for the Foundation Services and Features for the 1999 year.

Also attached is a table (Exhibit 3) showing the current monthly volume for BellSouth's CLEC interfaces through January 25, 2000. BellSouth proposes to test all of the electronically orderable top 50 resale services for pre-ordering and ordering, using EDI for residence and business and TAG for business. This proposal is based on the use of 5,000 Local Service Requests per month per interface as the measure for commercial

Ms. Helen O'Leary
February 7, 2000
Page Two


usage on the electronic interfaces. Applying this test to the month-to-date volumes for January results in testing EDI for residence and business, and TAG for business.

For the end-to-end testing, which includes preordering, ordering, as well as the downstream functions of provisioning, billing, and maintenance and repair, BellSouth proposes to focus on those Foundation Services that are used by CLECs to provide service to their customers in the first instance. For these services, BellSouth proposes to define commercial usage either 5% of the associated retail volume or more than 10,000 units in service. Applying this test, BellSouth would perform end-to-end testing for the Measure Rate Business Line, the Measured Rate Residence line, the Flat Rate PBX Trunk, the Measure Rate PBX Trunk, the ISDN Basic Rate Line, and Synchronet. In addition, this end-to-end testing will also include various Features that are typically ordered in conjunction with each of these services.

To the extent applicable, the remaining Features are identical for all of the Foundation Services. Of course, not all of these Features are available for all Foundation Services. However, as can be seen from the spreadsheet, significant numbers of most of these Features have been provided. Of course, all of these Features will be tested for pre-ordering and ordering in conjunction with the interface testing described above. However, based on the units in service for these Features BellSouth would not propose end-to-end testing for them.

Finally, we believe that KPMG will support this approach to the testing of resold services under the Supplemental Test Plan.

Very truly yours,


Fred McCallum Jr.

FJM:nvd
Attachments

cc: Parties of Record

196134/196166/196173

EXHIBIT I

[illegible]

Note: Retail down and track costs of the sub-individual features/ratios are separately.

[illegible]

EXHIBIT 2

Type	Classification	Foundation Services	IN SERVICE QUANTITIES END OF PERIOD											
			Jan-89	Feb-89	Mar-89	Apr-89	May-89	Jun-89	Jul-89	Aug-89	Sep-89	Oct-89	Nov-89	Dec-89
Retail Lines	Business Line	FLAT RATE BUSINESS	3,100,330	3,102,888	3,103,438	3,103,779	3,106,878	3,100,488	3,089,808	3,078,544	3,089,333	3,059,210	3,045,927	3,033,107
Retail Lines	Business Line	MSGAMEAS RATE BUS	98,411	97,988	98,879	98,112	95,927	94,985	94,278	93,831	92,729	91,837	90,809	90,211
Retail Lines	ISDN Individual Line	ISDN INDIVIDUAL LINE	100,772	102,888	104,754	108,744	108,418	109,988	111,828	114,208	117,428	119,315	120,832	121,225
Retail Lines	PBX Trunk	FLAT RATE PBX TRUNKS/NARS	336,884	334,048	333,433	332,298	330,885	328,798	325,235	320,260	318,426	313,884	314,652	312,826
Retail Lines	PBX Trunk	MSGAMEAS RATE PBX	213,743	214,464	214,073	214,384	213,007	209,970	206,725	201,237	197,985	196,357	192,404	190,107
Retail Lines	Residence Line	FLAT RATE RESIDENCE	9,863,079	9,565,421	9,438,185	9,372,188	9,319,882	9,313,089	9,311,884	9,333,680	9,336,885	9,326,585	9,327,358	9,336,878
Retail Lines	Residence Line	MSGAMEAS RATE RES	844,805	837,778	829,005	822,434	818,707	813,808	807,439	800,427	802,945	803,828	806,308	808,948
Retail Other Services	Business Data Services	SYNCHRONET	147,986	147,731	146,833	146,042	138,988	134,014	133,360	132,936	132,378	131,581	130,958	129,757
Retail Lines	Residence Line	Features												
Retail Other Services	Business Services	INTEGRATED PKG-AREA PLUS	3,813,388	4,048,237	4,310,108	4,431,148	4,462,244	4,508,991	4,520,808	4,583,897	4,628,937	4,670,182	4,702,322	4,732,263
Retail Other Services	Business Services	OPT CALL PLAN (OCP)	491,588	508,082	524,801	535,171	541,508	538,793	534,273	528,871	528,284	531,083	548,482	551,028
Retail Other Services	Business Services	REMOTE CALL FWD	186,711	187,882	188,822	188,272	180,986	183,634	197,041	188,381	188,257	200,308	201,877	203,500
Retail Other Services	Vertical Services	TOUCHSTAR	16,235,323	16,871,188	17,802,413	17,988,515	18,107,808	18,270,110	18,451,733	18,807,774	18,772,782	18,918,000	19,027,138	19,154,253
Retail Other Services	Vertical Services	CUSTOM CALLING	21,886,982	22,254,833	22,841,880	22,883,089	22,985,487	22,982,248	23,012,143	23,081,128	23,114,057	23,150,888	23,220,423	23,293,114
Retail Other Services	Vertical Services	VISUAL DIRECTOR	4,237	4,111	3,948	3,816	3,701	3,691	3,492	3,372	3,270	3,180	2,974	2,880
Retail Other Services	Vertical Services	RINGMASTER	862,219	885,473	910,218	918,816	922,088	921,288	921,018	920,547	920,516	919,885	917,621	915,284
Retail Other Services	Vertical Services	CALL WAITING DELUXE	2,383,804	2,888,431	2,880,529	3,008,545	3,083,854	3,128,283	3,180,221	3,240,957	3,296,887	3,344,129	3,388,736	3,432,100
Retail Other Services	Vertical Services	MEMORYCALL SERVICE	2,981,611	2,808,881	2,886,478	2,887,204	2,713,109	2,711,870	2,715,878	2,722,835	2,728,582	2,730,011	2,740,078	2,738,200
Retail Other Services	Vertical Services	ENHANCED CALLERID (ST-UP)	34,284	35,883	37,584	38,801	41,345	44,985	49,181	53,048	56,828	60,153	63,043	65,313
Retail Other Services	Business Data Services	ACCUPULSE	1932	1908	1867	1843	1821	1784	1742	1710	1680	1648	1610	1574
Retail Other Services	Business Data Services	FLEXSERV	53814	53882	53478	53334	53297	52905	52748	52492	52198	52332	52272	51914
Retail Other Services	Business Data Services	FRAME RELAY	31013	31847	32384	33028	33889	41810	43154	44880	45841	46779	47988	48802
Retail Other Services	Business Data Services	LIGHTGATE	425	432	438	448	461	462	480	489	500	514	520	539
Retail Other Services	Business Data Services	MEGALINK	78008	80856	81970	82887	83725	85835	88842	88882	89732	90289	91481	92480
Retail Other Services	Business Data Services	MEGALINK ISDN	4227	4229	4238	4141	4130	4207	3831	3548	3175	3080	3032	3007
Retail Other Services	Business Data Services	NATIVE MODE LAN INTERCONNECTION	918	929	907	914	925	980	983	982	982	988	1001	1010
Retail Other Services	Business Data Services	SMARTPATH	259	240	240	241	241	1905	1930	1948	1920	1907	1920	1905
Retail Other Services	Business Data Services	SMARTRING	1302	1342	1379	1380	1438	478	485	503	620	545	550	582
Retail Other Services	Miscellaneous Other	CENTREX/ESSX	0	0	0	0	0	328	325	720	1702	5781	17927	35858
Retail Other Services	Miscellaneous Other	ES11/SAU	no data											
Retail Other Services	Miscellaneous Other	INDEPENDENT PAYPHONE PROVIDER	no data											
Retail Other Services	Miscellaneous Other	OFF PREMISE EXTENSIONS (OPX)	61745	61434	61163	60707	61786	61877	61190	60863	60803	60200	60099	58381
Retail Other Services	Miscellaneous Other	PRIMARY RATE ISDN	18423	18553	21021	22236	23419	24845	28132	27373	28882	30480	31493	32931
Retail Other Services	Business Services	DID	272538	271975	271102	268372	266121	268546	248557	235139	227089	224724	221985	219758
Retail Lines	Residence Line	INTEGRATED PACKAGES	3220412	3180221	3140471	3113899	3088673	3070111	3080399	3034482	3014707	2986383	2961901	2942440
Retail Lines	Multiserv Line	MULTISERV	188808	188829	188483	200086	189119	188003	188885	187848	186554	186825	182239	185420

**BellSouth CLEC OSS Interfaces and Processing
Current Volumes (Jan. 25, 2000 month to date)**

INTERFACE					Electronic Processing
EDI	TAG	LENS	MANUAL		LEO / LESOG
2,246	38, 329	94, 154	33,244	Resale - Simple Residential	167,973
1,332	1,152	4,101	5,804	Resale - Simple Business	12,379
2,803	1,078	221	18,504	UNEs (incl NP)	22,606
6,371	40,559	98,476	57,552	TOTALS	202,958

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

Newton M. Galloway
Newton Galloway & Associates
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Griffin, GA 30229

Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, GA 30346-2131

Kent Heyman, General Counsel
MGC Communications
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Las Vegas, NV 89129

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Atlanta, GA 30309-3592

Frank B. Strickland
Wilson, Strickland & Benson
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Atlanta, GA 30309

Jeremy D. Marcus, Esq.
Blumenfeld & Cohen
Co-Counsel for Rhythm, aka ACI Corp.
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Suite 300
Washington, DC 20036

Scott A. Sapperstein
Sr. Policy Counsel
Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

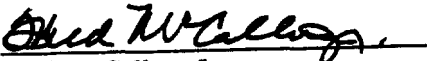
John P. Silk
Georgia Telephone Association
1900 Century Boulevard, Suite 8
Atlanta, GA 30345

Thomas K. Bond
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, GA 30334

James A. Schendt
Regulatory Affairs Manager
Interpath Communications, Inc.
P. O. Box 13961
Durham, NC 27709-3961

William R. Atkinson
Sprint Communications Co. L.P.
3100 Cumberland Circle
Mailstop GAATLN0802
Atlanta, GA 30339

This 7th day of February, 2000.


Fred McCallum Jr.

BellSouth Telecommunications, Inc.
125 Perimeter Center West, Suite 376
Atlanta, Georgia 30346
(770) 391-2416

107983



303 Peachtree Street, N.E.
Suite 2000
Atlanta, GA 30308

Telephone 404 222 3000
Fax 404 222 3050

RECEIVED

FEB 08 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

February 8, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

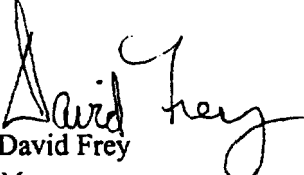
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG LLP's Exception 9 along with BellSouth's response for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,


David Frey
Manager

Enclosures

cc: Parties of Record



KPMG LLP, KPMG LLP, a U.S. limited liability partnership, is a member of KPMG International, a Swiss association.



EXCEPTION 9
BellSouth Georgia OSS Testing Evaluation

Date: January 20, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN¹ for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Rcvd	BLS Service Order Entry Date	KPMG Comments
627A214PEJ100001	9991	12/8/99 12:32pm	12/8/99 12:40pm	12/08/99 1:50pm	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99 1:15pm	12/29/99 1:15pm	1/3/00 10:39am	FOC was received 1/3/00 12:47pm on version 00. Supplemental LSR

¹ CNs are only expected on orders for which FOCs are received.



EXCEPTION 9

BellSouth Georgia OSS Testing Evaluation

PON	CC	Date/Time LSR Submitted	Date FA Recd	BLS Service Order Entry Date	KPMG Comments
					(version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.
387A225PEG100001	9992	1/12/00 9:03am	1/12/00 10:01am	1/12/00	No FOC or CN received as of 1/20/00.

Notes:

1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.
- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.



January 28, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception:

BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG did not receive an electronically-delivered FOC or CN¹ for service orders that BellSouth has generated and completed. The following table provides specific data on these instances. The 5th column (BLS FOC Date) lists the date and time the service order entered SOCS.

PON	CC	Date/Time LSR Submitted	Date FA Rev'd	BLS Service Order Entry Date	KPMG Comments
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443A224PEM000002	9991	12/13/99 4:51pm	12/13/99 4:55pm	12/17/99 8:00am	FOC delivered manually (via FAX) on 12/27/99. No electronic FOC or CN received as of 1/20/00.
454A126PTF100003	9991	12/22/99 1:26pm	12/22/99 1:26pm	12/22/99 3:02pm	No FOC or CN received as of 1/20/00.
204A211PTN100003	9994	12/29/99 1:15pm	12/29/99 1:15pm	1/3/00 10:39am	FOC was received 1/3/00 12:47pm on version 00.

¹ CNs are only expected on orders for which FOCs are received.

PON	CC	Date/Time LSR Submitted	Date FA Rec'd	BLS Service Order Entry Date	KPMG Comments
					Supplemental LSR (version 01) was submitted and acknowledged on 1/10/00. No FOC or CN has been delivered as of 1/20/00.
440A124PEM100003	9991	1/12/00 9:02am	1/12/00 10:01am	1/12/00 12:52pm	No FOC or CN received as of 1/20/00.
454A126PEF000004	9991	1/12/00 2:02pm	1/12/00 2:17pm	1/18/00 5:20pm	KPMG received 2 Clarifications (CLRs) on 1/12 and 1/18. No FOC or CN received as of 1/20/00.
387A225PEG100001	9992	1/12/00 9:03am	1/12/00 10:01am	1/12/00	No FOC or CN received as of 1/20/00.

Notes:

1. PON = Purchase Order Number
2. CC = Company Code
3. LSR = Local Service Request
4. FA = Functional Acknowledgement, an electronic notification to CLECs that BellSouth has received the LSR file.

Impact

The absence of electronic delivery of FOC or CN responses to valid service requests submitted via an electronic interface will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** Without an electronic FOC response, a CLEC cannot confirm, in a timely manner, that BellSouth has received a valid service request and that an internal BellSouth service order has been generated. A CLEC is unable to confirm a requested service delivery date and cannot communicate the date of expected service installation to its end user customer. The inability for a CLEC to commit to an expected service date will negatively affect a customer's perception of the CLEC's service capabilities.
- **Increase in operating costs.** If no electronic FOC or CN is received, CLEC personnel will be forced to pursue the status of these service orders. This will require additional time, effort and cost by the CLEC.

BST Response

Specific criteria must be present on an error-free service order for a Firm Order Confirmation and Completion Notice to be sent electronically. The criteria is the following fields must be present on the SOCS service order to trigger a FOC or CN:

AECN (UNE)

Sales Code begins with "YAXQ"

PON

MAN (UNE)

RESH (RESALE)

RMKR

On the seven PONs listed above, six failed to meet the criteria for a FOC or CN. BellSouth has not received PON 387A225PEG100001 CC 9992.

Service representatives in the Local Carrier Centers have been retrained on how to properly handle requests that fall out for manual processing to comply with our policy to provide FOCs and CNs within specified timeframes.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Director
Consumers' Utility Counsel
2 Martin Luther King Jr. Drive
Plaza Level East
Atlanta, GA 30334-4600

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Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
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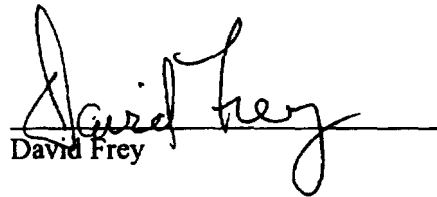
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